

Mescalero Apache Telecom, Inc. NETWORKS



March 5, 2014

Ms. Marlene Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

RE: Connect America Fund, WC Docket No. 10-90 Expression of Interest – Rural Experiments

Dear Ms. Dortch:

Mescalero Apache Telecom, Inc. (MATI), a wholly owned corporation by the Mescalero Apache Tribe located in Mescalero, New Mexico, is submitting this letter as an expression of interest in participating in the Rural Broadband Experiments described in the Commission's January 31, 2014 Order, Reports and Orders, and Further Notices of Proposed Rulemaking in GN Docket No. 13-5, et al. As the existing incumbent telecommunications provider, MATI operates one exchange in Lincoln and Otero Counties, New Mexico, which serves the Mescalero Apache Reservation. At this time, MATI currently provides voice and limited broadband (via digital subscriber line, or DSL) service to subscribers over a mixture of copper and fiber cable plant.

The proposed experiment would take place in MATI's (a rate of return regulated carrier) service area, and would upgrade a portion of MATI's copper distribution network to fiber-to-the-premises (FTTP) technology to 600 locations in multiple census blocks located within census tract 940000. MATI would provide voice and broadband services with broadband speeds of at least 10 Mbps downstream/1.5 Mbps upstream with the capability to provide up to 1 Gbps per subscriber. The voice service provided by the experiment will be voice over Internet protocol (VoIP)-based in an effort to provide a more reliable service with enhanced service capabilities versus the traditional time division multiplexing (TDM) technology in use today.

The proposed experiment will provide high speed broadband access to Mescalero Apache Schools, public safety facilities, and public health facilities located within the proposed service area.

The economic status and level of service in the proposed experiment areas fall below the (rural) national average. Deploying FTTP in the proposed experiment area will improve these factors along with several other impending community risks. Additionally, the Tribe

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continues to develop and support new housing areas that provide new homes for over-crowded housing conditions and is involved in economic development projects that affect MATI's customer base. The economy in MATI's serving area is predominately supported by forestry and various agencies of the Bureau of Indian Affairs (BIA). Other significant economic influences include various Mescalero tribal enterprises, including the Inn of the Mountain Gods Resort, Ski Apache Resort, Casino Apache and Mescalero Big Game Hunts. The majority of MATI's service area is in mountainous, forest terrain. MATI's ability to provide broadband to these tribal members, various tribal enterprises, public safety/health facilities, and schools will make a dramatic impact on the reservation and allow tribal members the same opportunities found in more urban settings with existing broadband service.

MATI estimates construction costs for the proposed experiment to be a total of \$5.4M. This cost includes approximately 54 miles of fiber construction, central office Optical Line Termination (OLT) equipment and subscriber equipment. MATI would request \$5.4M in one time funding to implement the experiment. This project would be shovel ready and could be implemented as soon as funding is made available.

This experiment would provide the FCC with valuable information regarding the technology transitions from copper based infrastructure to a fiber based infrastructure and from TDM based services to all IP based services in an extremely rural and economically challenged ILEC rate of return carrier area.

MATI looks forward to working with the FCC to potentially implement an experiment that would provide valuable information to the FCC while also providing the best broadband services capable via FTTP technology. If you have any questions regarding MATI's interest in this program please contact me directly at 505-795-5555.

Sincerely,

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